

Western District of Washington  
at Seattle

AT 103 1034

U.S. BANKRUPTCY COURT

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re:	)	No. 94-00542
	)	
	)	UNITED STATES'
UNITED MARINE SHIPBUILDING, INC.,	)	RESPONSE TO APPLICATION
	)	FOR ORDER AUTHORIZING
Debtor.	)	LEASE
	)	

The United States of America, by and through the undersigned attorneys, offers the following response to the Trustee's Application for Order Authorizing Lease of Debtor's Assets to Tippet Shipbuilding, Inc:

The Trustee represents in his Application for Authorization to Lease Debtor's Assets that the instant motion and proposed lease are subject to written consent from the Department of Justice. (Paragraph 9, Application.)


Based on representations of the lessee that there is no reason to expect that the use of the facility which is the subject of the motion, as described in the proposed lease, will cause or contribute to contamination at the facility or exacerbate existing contamination, the United States does not object to the instant motion or to approval of the proposed lease.

In his motion, the Trustee proposes to pay \$5,000 a month into an environmental clean up fund anticipated pursuant to the proposed sale of assets to Northlake Shipyard, Inc., and in the event the proposed asset sale is not approved, that the \$5,000 per month be paid to Northlake on its secured claim. If the \$5,000 is not earmarked for environmental clean up, the United States' position is that disposition of that money should be determined by the Court at a later date.

DATED this 7<sup>th</sup> day of April, 1994.

Respectfully,

LOIS J. SCHIFFER  
Acting Assistant Attorney General  
Environment and Natural Resources  
Division

  
RACHEL JACOBSON, Trial Attorney  
ALAN TENENBAUM, Trial Attorney  
U.S. Department of Justice  
Environmental Enforcement Section  
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(202) 514-5474

Creditors for 94-00542  
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AFCO Credit Corp  
21800 Oxnard St #800  
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Woodland Hills CA 91365

AFCO  
3500 188th St SW #201  
Lynnwood, WA 98036

AT&T  
P.O. Box 78225  
Phoenix, AZ 85062-8225

AT&T  
P.O. Box 94580  
Maitland, FL 32794-5800

Alaska Fishermen's Journ  
1115 NW 46th  
Seattle, WA 98107

Alpine Equipment Rentals  
9045 Willows Road  
Redmond, WA 98062

American Analytical Serv.  
8220 7th Ave. S.  
Seattle, WA 98108

American Bureau of Ship  
Two World Trade Ctr 106t  
New York NY 10048

Anthony's Industrial &  
Marine Services  
4360 Leary Way NW  
Seattle WA 98107

Association of Washington  
Business  
PO Box 658  
Olympia WA 98507-0658

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Atty General of WA  
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Seattle WA 98164

Boilermaker-Blacksmith  
National Pension Trust  
424 Old Brotherhood Bld  
Kansas City, KS 66101

CBD Weekly Release  
P.O. Box 90608  
Washington DC 20090-0608

CLC Communications Latcom  
900 Madison St.  
Seattle, WA 98104

Cave-Harrison Associate  
P.O. Box 5307  
Lacey WA 98503

Certified Inspection Serv  
1069 SW 328th Ct.  
Federal Way, WA 98023

Chanen, Clarke, Couden &  
Painter Ltd  
701 5th Ave #7150  
Seattle WA 98104

City Treasurer  
Seattle Engineering Dep  
600 4th Ave #420  
Seattle WA 98104-1879

City of Seattle  
Department of Finance  
P.O. Box 34908  
Seattle, WA 98124-1908

Cole Industrial Inc.  
P.O. Box 1336  
Lynnwood, WA 98036

Columbia Pacific Associ  
16285 SW 85th, #401  
Tigard, OR 97223

Commissioner Public Lands  
Olympia, WA 98504

Cooperheat  
P.O. Box 1006  
Shelton, WA 98584

Crane Consultants Inc.  
15303 First Ave. So.  
Seattle, WA 98148

Department of Natural Res  
Financial Services Div.  
P.O. Box 47041  
Olympia, WA 98504-7041

Eagle Ins Group Inc  
c/o Scott B Henrie  
Williams Kastner & Gibbs  
PO Box 21926  
Seattle WA 98111-3926

Eastside Medical Lab In  
P.O. Box 7118  
Bellevue, WA 98008-111

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Emerald City Disposal  
P.O. Box 24745  
Seattle, WA 98124

Emerald City Recycling  
P.O. Box 24745  
Seattle, WA 98124

Envir & Nat Resources Div  
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Enviro Enforcement Sectio  
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Washington DC 20044

Environmental Transport  
P.O. Box 84661  
Seattle, WA 98124

Evergreen Marine Leasing  
P.O. Box 160  
Seattle, WA 98111

F/V North Wind Inc  
c/o Irvin W Sandman  
Graham & Dunn  
1420 5th Ave #3300  
Seattle WA 98101-2390

Federal Express Corporati  
P.O. Box 1140 Dept. A  
Memphis, TN 38101-1140

Fire Aid  
378 Upland Drive  
PO Box 58627  
Seattle WA 98188

First Nat'l Bank of Ancho  
P.O. Box 100720  
Anchorage, AK 99510

First Nat'l Bk of Anch  
c/o David C Kelly  
Williams Kastner & Gibbs  
10900 NE 4th St #2000  
Bellevue WA 98004-5841

Fremont Tugboat Co., Inc.  
1059 N. Northlake Way  
Seattle, WA 98103

Friedman & Bruya Inc.  
3008B 16th W  
Seattle, WA 98119

Front Water Services, Inc  
8661 Dallas Ave.  
Seattle, WA 98108

General Welding Supply Co  
P.O. Box 3617  
Seattle, WA 98124

Global Diving & Salvage  
2763 13th Ave. SW  
Harbor Island  
Seattle, WA 98134

Government Data Publicati  
GOP Bldg (Accounting Div)  
1661 McDonald Ave.  
Brooklyn, NY 11230

Hellen & Accinelli  
500 L Street, Suite 500  
Anchorage, AK 99501

High Reach, Inc.  
4200 NW Yeon  
Portland, OR 97210

IBEW Pac Coast Pen Fund  
c/o Mel R Kang  
Ekman & Bohrer  
220 W Mercer St #400  
Seattle WA 98119

IBU Nat'l Health Ben  
c/o Aaron J Bell  
Brownstein Rask et al  
1200 SW Main  
Portland OR 97205

IBU Wage Claimants  
c/o Cheryl A French  
Spencer Nathan Thal  
2505 3rd Ave #309  
Seattle WA 98121

Industrial Indemnity  
Co of the Northwest  
c/o James T Yand Esq  
88 Spring St #500  
Seattle WA 98104-1095

Internal Revenue Service  
Special Procedures  
PO Box 1729, M/S 244  
Seattle WA 98111

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Seattle, WA 98107

Karl Senner, Inc.  
P.O. Box 10055  
New Orleans, LA 70181

King County Finance Divis  
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Seattle WA 98104

Lake Union Construction  
P.O. Box 70342  
Seattle, WA 98107

Legros Buchanan Paul &  
Whitehead  
701 Fifth Ave #2500  
Seattle WA 98104

Long Painting Co SR  
c/o James G Blair  
8575 164th NE #202  
Redmond WA 98052

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Long Painting Co.  
8025 - 10th Ave. S.  
P.O. Box C-81435  
Seattle, WA 98108

Machinists Inc.  
751 S. Michigan  
Seattle, WA 98108

Madden, Poliak, MacDougal  
Williamson  
1001 4th Ave St #2800  
Seattle WA 98154

Marine Midland Bank SR  
c/o Mark D Deife  
Karr Tuttle Campbell  
1201 3rd Ave #2900  
Seattle WA 98101

Marine Midland Bank  
140 Broadway  
New York, NY 90015

Marine Vacuum Service Inc  
P.O. Box 24263  
Seattle, WA 98124

Marine Yellow Pages  
439 Kirkland Way  
Kirkland, WA 98033

Mark L Evans  
Mullavey Prout Grenley et  
2401 NW 65th  
PO Box 70567  
Seattle WA 98107

Master Florists of Seattl  
2134 - 3rd Avenue  
Seattle, WA 98121

Motorola  
PO Box 100184  
Pasadena CA 91189-0184

NW Employees Retirement T  
SFNB-Automated Entry  
P.O. Box 24768  
Seattle, WA 98124

NW Fisheries Association  
2208 NW Market St., Ste.  
Seattle, WA 98107

NW Metalcrafts Trust Boil  
PO Box 84541  
Seattle WA 98124-5841

NW Metalcrafts Trust Mach  
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Seattle WA 98124-5841

Nat'l Bk of AK  
c/o Kimberly W Osenbaugh  
Bogle & Gates  
601 Union St #200  
Seattle WA 98101-2322

Nat'l Pension Fund  
c/o O'Donoghue & O'Donogh  
4748 Wisconsin Ave NW  
Washington DC 20016

National Bank of Alaska  
PO Box 10600  
Anchorage, AK 99510-0600

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1200 Sixth Ave  
Seattle WA 98101

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701 Fifth Avenue #3300  
Seattle, WA 98104-7007

Pac Coast Shipyards  
Metal Trades Trust Fund  
c/o Mel R Kang  
220 W Mercer St #400  
Seattle WA 98119

Pacific Coast Shipyards  
Metal Trades Trust Fund  
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San Francisco, CA 94160

Pacific Marine Equipment  
3441 Thorndyke West  
Seattle, WA 98119

Perkins Coie  
1201 Third Ave., 40th flo  
Seattle, WA 98101-3099

Phoenix Network  
P.O. Box 173716  
Denver, CO 80217-3716

Propulsion Systems  
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Seattle, WA 98103

Puget Sound Aid Pollution  
Control Agency  
ATTN Laurie S Halvorson  
110 Union St #50098101  
Seattle WA 98101

Raymond Holland  
8145 - 30th S.W.  
Seattle, WA 98126

Safway Steel Products  
P.O. Box 3925  
Seattle, WA 98124

Seattle City Light  
1015 3rd Ave  
Seattle WA 98104



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Seattle City Treasurer  
Solid Waste Utility  
Seattle, WA 98104

Seattle Combined Utility  
Seattle Water Dept  
ATTN Credit  
710 2nd Ave 10th Fl  
Seattle WA 98104

Seattle Machine Works  
1510 West Thurman  
Seattle, WA 98119

Sound Testing, Inc.  
P.O. Box 16204  
Seattle, WA 98116

The Work Clinic  
Paul S. Rnes, MD  
13030 Military Rd. So.  
Seattle, WA 98168

Tippett Shipbuilding  
c/o James R Woepfel  
Aiken St Louis & Siljeg  
801 2nd Ave #1200  
Seattle WA 98104

Track 3 Business Forms  
4020 - 148th Avenue, N.E.  
Redmond, WA 98052

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Seattle, WA 98121-2522

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Whiteplains NY 10604-356

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Department #333  
Denver, CO 80271-0333

U.S. West Communications  
P.O. Box 12480  
Seattle, WA 98191-0001

United Marine Tug & Barge  
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United Parcel Service  
P.O. Box 3665  
Seattle, WA 98124-3665

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Valley Systems, Inc.  
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Cincinnati, OH 45263-026

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Collections/Bankruptcy  
PO Box 44170  
Olympia WA 98504-4170

WA Dept of Revenue  
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2101 4th Ave #1400  
Seattle WA 98121-2317

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Ellen Moe  
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Puget Sound Regional Offi  
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Ekman & Bohrer  
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Seattle, WA 98124-9472

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Painters Trust  
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Seattle, WA 98124

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Spokane, WA 99206

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Seattle, WA 98138-1627